

KML LAW GROUP, P.C.

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Philadelphia, PA 19106

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January 20, 2017

Mary C. Andreassi
715 West Penn Street
Butler, PA 16001

RE: Mary C. Andreassi
Bankruptcy Case Number: 16-23323-GLT
Our File Number: 165723BK
Response Deadline: 02/06/2017
Hearing Date: 02/23/2017

Dear Sir or Madam:

Enclosed for service upon you and your counsel, is a true and correct copy of the Motion for Relief From Automatic Stay Under Section 362, filed by the lender, Ditech Financial LLC on January 20, 2017.

Also enclosed is the Notice of Motion, Response Deadline and Hearing Date which directs that the date within which an Answer must be filed by the Response date of **February 6, 2017**; and that the hearing on the Motion will be held on February **23, 2017** at the time and place indicated. Please contact your attorney if you wish to amicably resolve this matter prior to the Response Deadline of **February 6, 2017**. If you are represented by counsel, we must have their written authority to speak to you directly.

KML LAW GROUP, P.C.

Joshua Jonas, Legal Assistant
For James C. Warmbrodt, Esquire
Direct (215) 825-6490
jjonas@kmlawgroup.com

Enclosure
JCW/

cc: Attorney: Dai Rosenblum
Trustee: Robert Shearer

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Mary C. Andreassi

Debtor

Ditech Financial LLC

Movant

vs.

Mary C. Andreassi

Respondent

Robert Shearer, (Trustee)

Additional Respondent

BK NO. 16-23323-GLT

Chapter 7

Related to Document No.

Hearing Date: February 23, 2017

Hearing Time: 10:00 AM

Objection Deadline: February 6, 2017

**CERTIFICATE OF SERVICE OF NOTICE OF HEARING ON
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

I, James C. Warmbrodt, of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on January 20, 2017, I served the above captioned pleading, along with the Motion filed in the proceeding on the parties at the addresses shown below;

Debtor

Mary C. Andreassi
715 West Penn Street
Butler, PA 16001

Trustee

Robert Shearer
5703 Brewster Lane
Erie, PA 16505

Attorney for Debtor

Dai Rosenblum
254 New Castle Road
Suite B
Butler, PA 16001
dunmyrem@zoominternet.net

U.S. Trustee

Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, Pa 15222

Method of Service: electronic means or first class mail

Dated: January 20, 2017

/s/ James C. Warmbrodt, Esquire

James C. Warmbrodt, Esquire
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701 Market Street, Suite 5000
Philadelphia, PA 19106
Phone: 412-430-3594
Attorney for Movant/Applicant

